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22 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

PNC BANK, N.A.,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,
INC., et al.,

Defendants.

Case No.: 2:22-cv-00301-GMN-NJK

**STIPULATION AND PROPOSED
ORDER EXTENDING DEFENDANT
FIDELITY NATIONAL TITLE
INSURANCE COMPANY'S TIME TO
RESPOND TO MOTION FOR
REMAND [ECF No. 14]**

(First Request)



1 Defendant Fidelity National Title Insurance Company (“Fidelity”) and Plaintiff PNC
2 Bank, N.A. (“PNC Bank”) (collectively, the “Parties”), by and through their counsel of record,
3 hereby stipulate and agree as follows:

- 4 1. On February 17, 2022, PNC Bank filed its Complaint in the Eighth Judicial District
5 Court, Case No. A-22-848525-C [ECF No. 1-1];
- 6 2. On February 17, 2022, Fidelity filed a Petition for Removal to this Court [ECF No. 1];
- 7 3. On March 21, 2022, PNC Bank filed a Motion for Remand [ECF No. 14];
- 8 4. Fidelity’s deadline to respond to PNC Bank’s Motion for Remand is currently April 4,
9 2022;
- 10 5. Fidelity’s counsel is requesting an extension until Monday, April 11, 2022, to file its
11 response to the pending Motion for Remand;
- 12 6. Fidelity requests a brief extension of time to respond to the Motion for Remand to
13 afford Fidelity additional time to respond to the legal arguments set forth in PNC
14 Bank’s motions;
- 15 7. PNC Bank does not oppose the requested extension;
- 16 8. This is the first request for an extension which is made in good faith and not for
17 purposes of delay;

18 **IT IS SO STIPULATED** that Fidelity’s deadline to respond to PNC Bank’s Motion for
19 Remand [ECF No. 14] is hereby extended through and including April 11, 2022.

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22 Dated: April 4, 2022

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

23
24 By: /s/-- Sophia S. Lau
SCOTT E. GIZER
SOPHIA S. LAU
Attorneys for Defendant FIDELITY
NATIONAL TITLE INSURANCE
COMPANY
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1 Dated: April 4, 2022

SINCLAIR BRAUN LLP

2 By: /s/-Kevin S. Sinclair

3 KEVIN S. SINCLAIR

4 Attorneys for Defendant FIDELITY
NATIONAL TITLE INSURANCE
COMPANY

5 Dated: April 4, 2022

6 WRIGHT FINLAY & ZAK, LLP

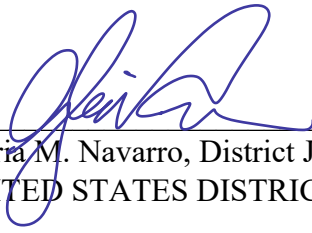
7 By: /s/-Lindsay D. Dragon

8 LINDSAY D. DRAGON

9 Attorneys for Plaintiff PNC BANK, N.A.

10
11 **IT IS SO ORDERED** *nunc pro tunc*.

12 Dated this 18 day of April, 2022.

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16 Gloria M. Navarro, District Judge
17 UNITED STATES DISTRICT COURT
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CERTIFICATE OF SERVICE

I hereby certify that on April 4, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ Valerie Segura

VALERIE SEGURA

An Employee of EARLY SULLIVAN

WRIGHT GIZER & McRAE LLP

